REMARKS

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

Status of Claims:

Claim 20 is currently being cancelled.

Claims 1-17 are currently being amended.

Claims 21-28 are currently being added.

This amendment adds, cancels and amends claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claims remain under examination in the application, is presented, with an appropriate defined status identifier.

After amending, adding and canceling the claims as set forth above, claims 1-17 and 21-28 are now pending in this application.

Specification Amendments:

The specification has been amended to include appropriate section headers in conformance with standard U.S. Patent Practice, and to correct two minor grammatical errors found on page 7 of the specification.

Objection to Claim 20:

In the Office Action, claim 20 was objected to because it should be in the format of an independent claim. Due to the cancellation of claim 20, this objection is now moot.

35 U.S.C. § 101 Rejection of Claims 1-17 and 20:

In the Office Action, claims 1-17 and 20 were rejected under 35 U.S.C. § 101 as being non statutory "because they merely recite steps that can be performed by a person with pen and paper", and since "the use of a computer or data processor has not been indicated being

used to perform the steps." By way of this amendment and reply, the use of a computer has been included in both the apparatus claims and the method claims, and thus all of the presently pending claims are believed to fully comply with 35 U.S.C. § 101.

Claim Rejections – Prior Art:

In the Office Action, claims 1-5, 8-14, 17 and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2003/0074356 to Kaler et al. in view of U.S. Patent No. 6,944,627 to Zhang et al.; and claims 6, 7, 15 and 16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Kaler et al. in view of Zhang et al. and further in view of U.S. Patent No. 5,999,942 to Talati. These rejections are traversed with respect to the presently pending claims under rejection, for at least the reasons given below.

In its rejection of independent apparatus claim 1, the Office Action asserts that paragraph 0047, lines 1-5 of Kaler et al. teaches a storage specification generator for generating a storage specification for the document therefrom. Applicant respectfully disagrees. Paragraph 0047 of Kaler et al. describes that when two metadata elements are in conflict, one metadata element may replace the other metadata element, or they may be selectively intersected. There is nothing in paragraph 0047 of Kaler et al. regarding the storing of a document in accordance with a storage specification. In other words, while Kaler et al. describes the merging of conflicting metadata in order to create new metadata for a document, Kaler et al. does not teach or suggest the generating of a storage specification that is used for storing of a document in a particular storage location based on the newly created metadata. It is noted that Zhang describes the storing of metadata in a hierarchical database, but this has nothing to do with the storage of a document itself based on a storage specification for the document.

Accordingly, claim 1 is patentable over the combination of Kaler et al. and Zhang.

Independent method claim 8 recites similar features to those discussed above with respect to independent apparatus claim 1, and thus it is also patentable over the combination of Kaler et al. and Zhang.

With respect to dependent claims 6 and 15, the Office Action asserts that column 8, lines 38-41 and column 13, lines 41-55 of Talati discloses a method to interact with a user using a user interface to add attribute data. Applicant respectfully disagrees. Column 8, lines

41-55 of Talati describes the use of a graphical user interface (GUI) by a user in order to select an instant. As described in column 3, lines 53-67 of Talati, an 'instant' refers to a given condition or state of the values of attributes of a dataset defining a set of attributes, whereby an 'active instant' has values already assigned to the set of attributes and an 'empty instant' does not have values assigned to the set of attributes. As described in column 8, lines 43-50 of Talati, once the user selects an instant to be populated, it is not the user that performs the population of the attributes of the instant, but rather the Control System Engine (CSE) that populates the instant. Thus, unlike the recitations in claims 6 and 15, a user query is utilized in order to receive data from a user in order to obtain user-inputted information to provide information to be inputted to the uninstantiated field. In Talati, on the other hand, the CSE, which is a computer and not a user, is the element that resolves any conflicts.

Accordingly, claims 6 and 15 are patentable over the combination of Kaler et al., Zhang and Talati for these additional reasons, beyond the reasons provided above for their respective base claim.

In claims 7 and 16, if a conflict exists for at least one field common to the storage specification templates, but that no rule is provided to reconcile the conflict, a user query is referred to a user interface in order to obtain user-inputted information to provide information to be inputted to the at least one field to thereby reconcile the conflict. In Talati, on the other hand, the CSE, which is a computer and not a user, is the element that resolves any conflicts. Column 12, lines 12-23 and column 13, lines 29-37 of Talati, which are cited against claim 7, merely describe that invalid action rules are performed by a computer, and whereby a user can change a flag or add a propagation expression to correct a problem to enforce an expected behavior. That flag change is not itself inputted to a field, but rather is utilized by a computer program to resolve a problem, whereby the computer, and not the user, determines the entry to place in a 'problem field.'

Accordingly, claims 7 and 16 are patentable over the combination of Kaler et al., Zhang and Talati for these additional reasons, beyond the reasons provided above for their respective base claim.

New Claims:

New claims 21-28 have been added to recite additional features of the present invention that are believed to provide a separate basis of patentability for these new claims.

For example, new claims 21 and 22 recite that the computer apparatus initially reconciles storage specification template conflicts according to the relative storage specification hierarchy, and then the computer apparatus resolves conflicts among particular ones of the storage labels that would cause different numeric or character values being inputted to a particular field in a storage specification template, in accordance with predetermined conflict resolution rules stored in the rules database for the particular field and the particular ones of the storage labels. This hierarchy of performing reconciliation checks, as described on page 9, lines 6-15 of the specification, is not taught or suggested by the cited art of record, alone or in combination.

Also, new claims 23 and 24 recite that the user is provided with a drop-down display that includes values that can be entered for the uninstantiated field, and wherein, once the user makes a selection on the drop-down display, the selected value is stored in the uninstantiated field. See, for example, page 11, lines 1-10 of the specification, whereby such features are not taught or suggested by the cited art of record, alone or in combination. Claims 26-28 recite other features of a user entering in information via a drop down display, whereby such features are not taught or suggested by the cited art of record, alone or in combination. New claim 25 recites that if the user-inputted information results in a conflict, the user-inputted information is rejected from being entered in the at least one field, and user is prompted to re-input information to be stored in the at least one field. See page 11, lines 9-10 of the specification, for example. Such features as recited in new claim 25 are not taught or suggested by the cited art of record, alone or in combination.

Conclusion:

Since all of the issues raised in the Office Action have been addressed in this Amendment and Reply, Applicant believes that the present application is now in condition for allowance, and an early indication of allowance is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment,

to Deposit Account No. 08-2025. Should no proper payment be enclosed herewith, as by a check or credit card payment form being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 08-2025. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 08-2025.

Respectfully submitted,

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